

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 CHAD STANBRO,

PLAINTIFF,

5 -against-

Case No.:
19-CV-10857

6 WESTCHESTER COUNTY HEALTH CORPORATION,
7 WESTCHESTER MEDICAL CENTER, FRANK WEBER,
8 AND JOHN FULL,

9 DEFENDANTS.

10 CHAD STANBRO,

PLAINTIFF,

11 -against-

Case No.:
19-CV-10857

12 C.O. NADYA PALOU, C.O. RAYMOND DEAL, C.O.
13 KRISTOPHER LEONARDO, C.O. RICHARD LANDRY,
14 CORRECTION NURSE GARY PAGLIARO, AND
15 CORRECTION SERGEANT ENRIQUE TORRES,

16 DEFENDANTS.

17
18 DATE: April 29, 2021
19 TIME: 12:30 P.M.
20

21 DEPOSITION of the Defendant,
22 NADYA PALOU, taken by the respective
23 parties, pursuant to an Order and to the
24 Federal Rules of Civil Procedure, held via
25 videoconference, before Victoria Chumas, a
Notary Public of the State of New York.

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2 A P P E A R A N C E S:
3

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Jason Miller
Andrew Weiss

* * *

1
2 F E D E R A L S T I P U L A T I O N S
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4

5 IT IS HEREBY STIPULATED AND AGREED by and
6 between the counsel for the respective
7 parties herein that the sealing, filing and
8 certification of the within deposition be
9 waived; that the original of the deposition
10 may be signed and sworn to by the witness
11 before anyone authorized to administer an
12 oath, with the same effect as if signed
13 before a Judge of the Court; that an
14 unsigned copy of the deposition may be used
15 with the same force and effect as if signed
16 by the witness, 30 days after service of
17 the original & 1 copy of same upon counsel
18 for the witness.
19

20 IT IS FURTHER STIPULATED AND AGREED that
21 all objections except as to form, are
22 reserved to the time of trial.
23

24 * * * * *
25

1 N. PALOU

2 N A D Y A P A L O U, called as a witness,
3 having been first duly sworn by a Notary
4 Public of the State of New York, was
5 examined and testified as follows:

6 EXAMINATION BY

7 MR. SIVIN:

8 (Whereupon, PDF Documents were
9 deemed marked as Plaintiff's Exhibits
10 34-36 for identification as of this
11 date by the Reporter.)

12 Q. Please state your name for the
13 record.

14 A. Nadya Palou.

15 Q. What is your address?

16 A. 919 Valenciano Abajo, Juncos,
17 Puerto Rico 00777.

18 Q. Good afternoon, Ms. Palou. My
19 name is Edward Sivin, and I represent the
20 plaintiff in this lawsuit whose name is
21 Chad Stanbro. I am going to be asking you
22 some questions about an incident that took
23 place on August 31, 2018 at the Westchester
24 Medical Center. If for any reason you
25 don't understand a question or a question

1 N. PALOU

2 is not clear or you can't hear the question
3 for whatever reason, don't answer the
4 question. Ask me to repeat it or rephrase
5 it, and I will do so, okay?

6 A. Okay.

7 Q. I'm also going to ask that all
8 of your responses be verbal because the
9 stenographer can't take down hand gestures
10 or head gestures, okay?

11 A. All right.

12 Q. All right. Now, you understand
13 that you just took an oath where you swore
14 to tell the truth, correct?

15 A. Correct.

16 Q. And do you understand that is
17 equivalent to an oath that you would take
18 if you were actually in a courtroom. You
19 are under the same obligation to tell the
20 truth; do you understand that?

21 A. Yes, I do.

22 Q. Okay. On August 31, 2018, were
23 you a correction officer employed by the
24 Department of Corrections and Community
25 Supervision?

1 N. PALOU

2 A. I was.

3 Q. And what facility were you at?

4 A. I was at Fishkill Correctional
5 Facility.

6 Q. When did you graduate the
7 academy?

8 A. That was in January of 2015.

9 Q. I would like you to take me
10 through your assignments from when you
11 graduated until you left DOCCS?

12 A. I went through the academy up
13 in Albany. I graduated the academy, and I
14 was sent to Greene Correctional Facility.
15 After that, I was transferred to Fishkill
16 Correction Facility.

17 Q. How long were you at Greene
18 Correction Facility?

19 A. Only a couple of months. I
20 want to say maybe two -- anywhere between
21 two to four months.

22 Q. What did you do during those
23 two to four months at Greene Correctional
24 Facility? What were your job duties?

25 A. I was what they call a resource

1 N. PALOU

2 Q. Okay. And after you saw the IV
3 being administered, what is the next thing
4 you recall happening inside of the dental
5 office?

6 A. I just recall the procedure
7 starting, and Dr. Weber...

8 Q. What did you see or hear with
9 respect to this procedure?

10 A. Well, Dr. Weber was just doing
11 something in Mr. Stanbro's mouth, that was
12 pretty much it.

13 Q. What is the next thing you saw
14 or heard after you saw Dr. Weber doing
15 something in Mr. Stanbro's mouth?

16 A. At one point, I heard Mr.
17 Stanbro, you know, complaining that it
18 hurt, and then Dr. Weber saying, okay I am
19 going to give you some more local
20 anesthesia. You know, the needle they
21 stick in your gums and stuff like that.
22 So I remember Dr. Weber doing that and then
23 the procedure just continued.

24 Q. So you saw Dr. Weber apply more
25 local anesthesia in the form of a needle in

1 N. PALOU

2 the mouth, correct?

3 A. Correct.

4 Q. And then Dr. Weber continued
5 with the dental procedure?

6 A. Correct.

7 Q. What's the next thing that
8 happened that you saw?

9 A. Once again, I remember after he
10 gave the anesthesia there locally, he then
11 also you know proceeded with the procedure,
12 and then at one point Mr. Stanbro once
13 again complained about pain to the mouth.

14 Q. What happened then after
15 Stanbro complained for the second time
16 about the pain in his mouth?

17 A. Well, the doctor was like, I
18 already gave you some local anesthesia.
19 And he was like, well, it hurts. And then
20 I don't remember -- I don't recall at that
21 point if Dr. Weber gave him some more local
22 anesthesia, but just remember that from
23 that point on Stanbro kept complaining
24 about having pain in his mouth.

25 Q. What happened next after Mr.

1 N. PALOU

2 Stanbro continued complaining about pain in
3 his mouth?

4 A. There was a point in time he
5 kept complaining, and Dr. Weber was like,
6 well, I have to do this. You need to open
7 your mouth or do something. He was like,
8 well it hurts, and that's when Stanbro, I
9 guess from the pain and stuff, like that he
10 started getting agitated. And Dr. Weber
11 was like, well I can stop the procedure or
12 I can, you know, take the hardware off or
13 something a long those lines. And Chad
14 just kept complaining, like it hurts.

15 Q. And what happened then after
16 Dr. Weber explained these various options
17 to Mr. Stanbro?

18 A. Mr. Stanbro started getting,
19 you know, started getting agitated and
20 stuff like that. He said it hurt, and then
21 at one point he came and he like abruptly
22 sat up, and was agitated because I guess he
23 was in pain.

24 Q. Now, at the point where he sat
25 up, was he in any type of handcuffs or leg

1 N. PALOU

2 restraints at that point?

3 A. He had the leg restraints. The
4 leg restraints never came off of him. The
5 handcuffs came off of him due to them
6 having to start the anesthesia. So he sat
7 up, and then he swung his legs around, so
8 like his legs were touching the ground, and
9 he was sitting up.

10 Q. Now, when you say the handcuffs
11 were taken off, were they taken off both
12 hands or just one hand?

13 A. Both hands.

14 Q. So then you say Mr. Stanbro sat
15 up and swung his legs around and his feet
16 were touching the ground; is that correct?

17 A. Yeah, from what I can see
18 because he was -- I am short, so everybody
19 is taller than me at this point. So he was
20 a taller guy, so you know, his legs were
21 just swung around to the floor, and he was
22 sitting up, and he was agitated. He was in
23 pain, I guess.

24 Q. What happened after Mr. Stanbro
25 sat up?

1 N. PALOU

2 A. When he sat up, I noticed that
3 he had clenched his fists, and when he
4 clenched his fists, I immediately -- still
5 outside of the room, I immediately started
6 giving him verbal commands. You know,
7 Stanbro, you need to calm down, relax, take
8 a deep breath, stay sitting down. And he
9 just -- he was agitated. He was breathing
10 fast and heavy, like that heavy breathing,
11 and he still had his fists clenched.

12 Q. Now, when you say "heavy
13 breathing," would you characterize that as
14 hyperventilating?

15 A. Yes.

16 Q. Where was Officer Deal during
17 this time when Mr. Stanbro was sitting up
18 in the chair and hyperventilating and had
19 his fists clenched?

20 A. He was down towards where Chad
21 Stanbro's feet would be, so towards the
22 back of the room. At that point, when
23 Stanbro sat up in the chair, Deal stood up,
24 so he was standing towards the back of the
25 room.

1 N. PALOU

2 Q. What happened next?

3 A. At that point, Stanbro, again
4 he was agitated. I was still giving him
5 the verbal commands to calm down, relax,
6 and he was hyperventilating and he took a
7 swing with his right hand, took a swing
8 like if he meant to hit the doctor, but
9 there was no way he was going to connect
10 because at that point Dr. Weber was towards
11 the door of the room.

12 Q. What happened after you say Mr.
13 Stanbro took a swing?

14 A. He took a swing, and he was
15 still sitting down. He took the swing with
16 his right hand, and he was still agitated,
17 and at that point, he stood up. I was
18 still by the door area, and I was like,
19 Stanbro, you need to calm down. You need
20 to sit down, relax, take a deep breath.
21 And I am still trying to give him verbal
22 commands, but at this point he had turned
23 toward my partner.

24 Q. What happened after Stanbro
25 turned towards your partner?

1 N. PALOU

2 A. When he turned toward my
3 partner, we were like, listen, calm down,
4 don't even think about it, relax. And then
5 at that point Deal started giving him
6 verbal commands to sit down. And that's
7 when I guess he got even more agitated and
8 then tried to do the same thing to my
9 partner. Like, he took a swing at my
10 partner, but there was no way he was going
11 to connect because of the distance.

12 Q. So he did not connect with this
13 swing; is that correct?

14 A. That is correct.

15 Q. All right. What happened after
16 Stanbro took that second swing?

17 A. When he took that swing at my
18 partner, at this point Officer Leonardo was
19 -- how can I explain it? He was at the
20 door, and I was like a step behind or a
21 step and a half behind Officer Leonardo,
22 but Leonardo was in front of me, but like
23 my halfway point on my body. So he was
24 towards my left side, and I still had my
25 right side. I could see through my right

1 N. PALOU

2 side, and he was in front of me towards my
3 left side.

4 Q. Did Leonardo have a weapon on
5 him?

6 A. I do not recall to be quite
7 honest.

8 Q. Okay. So what is the next
9 thing you saw after Leonardo was a little
10 bit in front of you and Stanbro had taken a
11 second swing?

12 A. Okay, well Stanbro took a
13 second swing, like I said, Leonardo was in
14 front of me. At that point, Officer
15 Leonardo grabbed him I want to say from
16 behind because he was behind Stanbro.
17 Stanbro was facing my partner. He grabbed
18 him from behind and got him onto the dental
19 chair.

20 Q. Describe the manner in which
21 Leonardo grabbed Mr. Stanbro from behind?

22 A. He put his right arm underneath
23 I want to say -- Mr. Stanbro was facing --
24 he put his right arm underneath his right
25 side, and put his left arm over his

1 N. PALOU

2 shoulder and just kind of put him down into
3 the dental chair.

4 Q. What portion of Mr. Stanbro did
5 Officer Leonardo's right arm make contact
6 with?

7 A. I want to say his chest area.

8 Q. And what did Officer Leonardo
9 do then?

10 A. He got him onto the dental
11 chair, and was still holding him on the
12 dental chair. At that point, that's when I
13 came in and I grabbed with my left hand Mr.
14 Stanbro's right arm. And I started
15 putting -- keeping the weapon away from
16 him, started putting downward pressure with
17 the rest of my body onto his legs to try to
18 control at least the thigh part of his
19 legs.

20 Q. How did Leonardo get Mr.
21 Stanbro back down into the dental chair?

22 A. He pulled him down into the
23 dental chair.

24 Q. So Leonardo was standing behind
25 Stanbro at that point?

1 N. PALOU

2 A. Correct. He was standing in
3 front of me behind Stanbro.

4 Q. Okay.

5 A. We were at like the door area.

6 Q. And once Leonardo got Stanbro
7 back down into the dental chair, did
8 Leonardo continue to make contact with Mr.
9 Stanbro?

10 A. Yes. He continued to hold him
11 because at that point Mr. Stanbro was not
12 being compliant with the orders for him to
13 stop resisting and just relax, so he
14 continued to fidget, so Officer Leonardo
15 continued to hold him, hold his top part
16 while I continued to hold his right hand,
17 his right arm and continued to put downward
18 pressure on his legs.

19 Q. So one of your arms was holding
20 Stanbro's arms and one was holding
21 Stanbro's legs; is that correct?

22 A. My left hand was holding
23 Stanbro's arm and I was putting downward
24 pressure on his legs with my right arm and
25 you know my body weight, trying to keep the

1 N. PALOU

2 weapon away from him.

3 Q. And how about Officer Deal?
4 What, if anything, is he doing at this
5 point?

6 A. Officer Deal, at this point, he
7 went to try to grab Stanbro's feet because
8 he was kicking still. From the knee down,
9 he was still able to move his feet. And at
10 that point, Stanbro kind of what I describe
11 as like a donkey kick, he kind of cocked
12 his legs back and just kicked my partner.

13 Q. Was Stanbro lying on his back,
14 his stomach, or his side at this point?

15 A. No, he was on his back. He was
16 sitting down in the dental chair, not
17 sitting in a -- what I would probably say
18 is a comfortable position, but he wasn't
19 like completely -- he was kind of slouched
20 down on the chair, but he was still sitting
21 with his back on the dental chair.

22 Q. Okay. Did you ever see Officer
23 Leonardo make contact with Mr. Stanbro's
24 neck?

25 A. He was holding the upper part

1 N. PALOU

2 of his body, yes.

3 Q. Just to be clear, did you ever
4 see Officer Leonardo make contact with Mr.
5 Stanbro's neck?

6 A. Not directly with his neck.
7 He was holding his head and his upper part
8 of his body.

9 Q. How was he holding his head and
10 the upper part of his body?

11 A. With his hands. I don't recall
12 exactly where his hands were, but his hands
13 were like on his head, and he was telling
14 him calm down, stop moving, stop fidgeting
15 as he is holding his head. I do remember
16 Stanbro's face was like kind of looking in
17 my direction, so towards the right side,
18 but that's about it.

19 Q. Now, were both of Officer
20 Leonardo's hands against Mr. Stanbro's head
21 or only one of his hands?

22 A. I couldn't really see where his
23 -- I know one of his hands were by his
24 head, but I couldn't really see if his
25 other hand was still behind his back or

1 N. PALOU

2 where his other hand was. But I do
3 remember one hand being on like his upper
4 part, on his head part, holding him down.

5 Q. What portion of Mr. Stanbro's
6 head was being held down by Officer
7 Leonardo's hand?

8 A. I just saw his hand on his
9 head. I don't know like -- like I said,
10 Stanbro was looking towards the right, so I
11 want to say it was probably like towards
12 the back by his ear or something. I don't
13 remember exactly where his hand was.

14 Q. Okay. Do you know one way or
15 the other whether Leonardo at any point had
16 his hand against Mr. Stanbro's neck?

17 A. Not directly on his neck. I
18 saw it on his head like sideways like this.

19 MR. HEINZE: Indicating
20 touching the top left side of his
21 head.

22 A. Correct.

23 Q. Are you indicating by the left
24 ear?

25 A. Correct.

1 N. PALOU

2 Q. Okay. Any portion below the
3 left ear?

4 A. Not that I can see. I mean, at
5 this point like I said, I'm holding
6 Stanbro's hand and trying to put pressure
7 on his legs while also making sure my
8 partner was okay and giving directions to
9 my partner to get the handcuffs on Mr.
10 Stanbro.

11 Q. Okay. Now, do you recall
12 having a conversation with me over the
13 telephone a couple of months ago?

14 A. When you contacted me via
15 Facebook?

16 Q. Yes.

17 A. Yes.

18 Q. And at that time, did you
19 discuss with me what happened inside of the
20 dental office?

21 A. I told you exactly what I am
22 saying right now.

23 Q. Okay. Do you recall telling me
24 that Leonardo's forearm was against Chad's
25 neck?

1 N. PALOU

2 A. Well, if his hand is right here
3 on his left side by -- his hand is by his
4 left side by his ear on his head, so his
5 arm continues down that way, so I mean that
6 is what I can see from my direction.

7 Q. Okay. So you're saying that
8 his hand was on the side of his head and
9 his forearm was against Stanbro's neck; is
10 that correct?

11 A. I'm saying his hand was by the
12 left side of his head, and his arm
13 continues down, so I don't know if it was
14 actually on the neck area, but I know his
15 hand was like this (Indicating).

16 Q. Okay, but let me repeat the
17 question. Do you recall telling me that
18 Officer Leonardo's forearm was against Mr.
19 Stanbro's neck?

20 A. Like I said sir, if you
21 continue the trajectory of the arm, that's
22 where -- the hand was what I saw on his
23 left side. So if you continue the
24 trajectory of the arm, you know, I am going
25 to assume that the arm was somewhere in

1 N. PALOU

2 that area.

3 Q. In the area of the neck?

4 MS. COLLINS: Objection.

5 Q. When you say you assume it was
6 in "that area," are you referring to the
7 neck?

8 A. I am referring to when the
9 trajectory of the arm -- if the hand is
10 placed on the left side of the head, your
11 arm is going to continue down, so whether
12 it was directly on the neck, I could not
13 see if it was directly on the neck. All I
14 could see is the trajectory of where the
15 arm would be going as I am holding the
16 inmate while he was still moving around and
17 thrashing around and not being complaint.

18 Q. Okay. Physics and trajectories
19 aside, do you recall telling me that
20 Leonardo's forearm was against Chad's neck?

21 MS. COLLINS: Objection. Asked
22 and answered.

23 Q. You can answer.

24 A. Okay. Like I said, I recall
25 telling you that his hand was on his head

1 N. PALOU

2 on his left side. Whether his arm was
3 directly on his neck, that's what I could
4 see, his arm coming down. Whether it was
5 directly on his neck, skin -- his forearm
6 skin touching his neck, I am not 100
7 percent sure. That's what I could see, so
8 whether it was actually making contact with
9 his neck, it was around that area.

10 Q. Okay. For how long a period of
11 time did you see Officer Leonardo holding
12 Chad's head with his hand and then the
13 trajectory of his forearm going down?

14 A. Up until the moment that we
15 were able to get the handcuffs on him. Up
16 until the moment my partner, Deal, was able
17 to get the handcuffs on him. And we told
18 Deal, you know, get the chain underneath
19 him. So we got the chain underneath him,
20 and we were able to secure the inmate with
21 the mechanical restraints again.

22 Q. So how long a period of time in
23 total was this that Officer Leonardo had
24 his hand holding down Chad Stanbro's head?

25 A. I want to say maybe a minute.

1 N. PALOU

2 I mean, maybe a minute or two because by
3 the time Chad Stanbro kicked my partner, my
4 partner bounced off the wall, and we were
5 able to tell him to get the handcuffs on
6 him, so I want to say maybe, you know, two
7 to three minutes, maybe four minutes. I am
8 not 100 percent sure. I wasn't -- you
9 know, at the heat of the moment, I really
10 was not looking at the time to see what was
11 going on, how long it was taking. But I
12 want to say maybe a couple of minutes
13 because by the time Deal put the handcuffs
14 on him, we got the chain underneath him and
15 the black box to secure him.

16 Q. And during those two minutes or
17 so, or two or three minutes, or whatever it
18 was that Leonardo had his hand holding down
19 Chad Stanbro's head, did you see Leonardo
20 take his hand off at any point?

21 A. No, I did not. Because at that
22 point, Mr. Stanbro was still fidgeting, so
23 Leonardo was still holding him down.

24 Q. Okay. Did you see Leonardo
25 putting his weight on Chad's neck?

1 N. PALOU

2 A. Excuse me, can you repeat that?

3 You kind of broke up.

4 Q. All right. Do you recall
5 telling me that Leonardo was putting his
6 weight on Chad's neck?

7 A. I recall telling you that he
8 was holding Chad on the chair. I don't
9 recall using -- necessarily saying that he
10 was putting the pressure on his neck. He
11 was holding the inmate's upper torso area
12 because he was fidgeting.

13 Q. So after that two or
14 three-minute period when Officer Leonardo
15 had his hand on Chad's head until you got
16 him into restraints, after that period,
17 what happened?

18 A. Well, after we got him back in
19 the restraints, Chad kind of like calmed
20 down a little bit. He was still
21 hyperventilating and you know breathing
22 like just hyperventilating, upset, and all
23 of that stuff. At that point, I told my
24 partner, you guys got him, and I stepped
25 out of the room to go and give the watch

1 N. PALOU

2 commander a call.

3 Q. Before you left the room -- or
4 I should say immediately before you left
5 the room, was Chad Stanbro moving?

6 A. Yes. He was still moving. He
7 was hyperventilating, still moving. He
8 like, you know, he was still acting fine.
9 He had just calmed down. He was still
10 hyperventilating, but he was not like --
11 how would you say it? Like, I guess
12 fighting us. He wasn't being disorderly.

13 Q. How was he situated physically
14 in the office before you left?

15 A. He was still sitting in the
16 dental chair.

17 Q. Was he sitting upright, was he
18 lying back, or something else?

19 A. He was lying back in the dental
20 chair in the same position as the dental
21 chair was in.

22 Q. Okay. And at that point, he
23 was in hand restraints?

24 A. Yes. He was in hand
25 restraints and the leg shackles, which

1 N. PALOU

2 never came off.

3 Q. And immediately before you left
4 to call the watch commander, was anybody
5 physically restraining Mr. Stanbro at that
6 point?

7 A. No. At that point, Leonardo if
8 I recall correctly, Leonardo had already
9 like stepped away from him, but he was
10 still in that immediate area where he was
11 while he was holding him down, and Deal was
12 just standing next to me.

13 Q. But nobody was physically
14 touching Stanbro immediately before you
15 left the office; is that correct?

16 A. That is correct. Not at this
17 point. He was already in restraints, and
18 he had already calmed down.

19 Q. Okay. Was he speaking at that
20 point?

21 A. He was crying and he was -- I
22 mean, I don't recall like what he actually
23 said, but he was crying, and he was still
24 hyperventilating and I guess speaking.

25 Q. Did you see him moving any part

1 N. PALOU

2 of his body immediately before you left the
3 office?

4 A. Yes. He was still moving his
5 legs. He had moved his -- he had lifted
6 his arms, so he was still moving.

7 Q. Did he appear to have any
8 physical restrictions at the moment
9 immediately before you left the dental
10 office to call the watch commander?

11 A. No, not at the moment.

12 Q. So he appeared perfectly normal
13 to you at that point.

14 A. Yeah, he was just upset.

15 Q. Why did you at that point make
16 a call to the watch commander?

17 A. It's a policy that if we do
18 have a use of force we, you know, notify
19 the watch commander immediately of the use
20 of force.

21 Q. Now, other than yourself,
22 Officer Leonardo, and Officer Deal, did any
23 other officers assist in this use of force?

24 A. No, sir.

25 Q. How about Officer Landry?

1 N. PALOU

2 A. I did not see Officer Landry at
3 all until they went to say goodbye, that
4 they were leaving the facility.

5 Q. Did you see any other officers
6 enter the office besides Deal and Leonardo?

7 A. Just the Westchester Medical
8 officers that got right to the door.

9 Q. You're talking about the
10 security staff at Westchester Medical?

11 A. Yes, correct.

12 Q. And that was later after the
13 incident was all over, correct?

14 A. Correct.

15 Q. All right. So you called the
16 watch commander. And who was the watch
17 commander?

18 A. The watch commander was
19 Lieutenant Decosta.

20 Q. And what is her first name?

21 A. I think it's Stacey. I can't
22 remember.

23 Q. And how did you call her, on a
24 cell phone or some other manner?

25 A. No. I went into the office

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N. PALOU

C E R T I F I C A T E


STATE OF NEW YORK)
: SS.:
COUNTY OF ORANGE)

I, VICTORIA CHUMAS, a Notary Public
for and within the State of New York, do
hereby certify:

That the witness whose examination is
hereinbefore set forth was duly sworn and
that such examination is a true record of
the testimony given by that witness.

I further certify that I am not
related to any of the parties to this
action by blood or by marriage and that I
am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 18th day of May 2021.



VICTORIA CHUMAS